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TAHARA DAY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
TAHARA DAY,  
  
Defendant.

Case No.: 13-CR-0028 CW

**DEFENDANT TAHARA DAY'S UNOPPOSED  
APPLICATION AND [PROPOSED] ORDER  
FOR TEMPORARY DOMESTIC TRAVEL  
OUTSIDE THE NORTHERN DISTRICT OF  
CALIFORNIA**

Defendant Tahara Day has been released from custody in this action on various terms and conditions under the supervision of Pretrial Services. The conditions of Ms. Day's release prohibit her from traveling outside the Northern District of California. Ms. Day hereby requests that the Court permit her to travel outside the Northern District of California based on the following:

1. Ms. Day's sister and father live in Stockton, California. Ms. Day wishes to take her young son to visit the family in Stockton. She hopes to travel in the near future before her father returns to classes at college.
2. If granted permission by this Court, Ms. Day will travel by car to Stockton for a visit of no more than four days, returning to the Northern District of California by no later than Wednesday, August 14, 2013, depending on the date of departure.
3. While in Stockton, Ms. Day intends to stay at her sister's house and will be

1 reachable locally on her mobile phone at 510-938-6279. Ms. Day will remain in the Stockton area  
2 during this entire time.

3 4. United States Pretrial Services Officer Nelson Barao has been consulted as to a  
4 proposed temporary modification of the terms of Ms. Day's release to allow Ms. Day to travel  
5 outside the Northern District of California to visit family in Stockton, California, during the  
6 above-identified dates. Mr. Barao has stated that he does not object.

7 5. Ms. Day's counsel, Patrick Robbins, contacted Assistant U.S. Attorney Kevin  
8 Barry concerning this request. Mr. Barry advised Mr. Robbins that the government does not  
9 oppose it.

10 Accordingly, Ms. Day respectfully requests that the terms of her release be modified  
11 temporarily to permit the requested travel. Ms. Day will continue to observe all other terms of her  
12 release while in Stockton.

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14 Dated: August 6, 2013

Respectfully submitted,  
SHEARMAN & STERLING LLP

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17 By: /s/ Patrick D. Robbins  
Patrick D. Robbins

18 Attorneys for Defendant  
19 TAHARA DAY  
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**[PROPOSED] ORDER**

Based on the foregoing, and good cause appearing, IT IS HEREBY ORDERED that Defendant Tahara Day's conditions of release are hereby temporarily modified to permit her to travel outside of the Northern District of California consistent with the terms and conditions set forth above.

**IT IS SO ORDERED.**

Dated: 8/7/13

  
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Honorable Kandis A. Westmore  
United States Magistrate Judge